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**To:** [CBSC@DGS](mailto:CBSC@DGS); [eric@accessibleroute.com](mailto:eric@accessibleroute.com)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Eric McSwain  
**Date:** Monday, April 24, 2023 3:24:39 PM

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#### Commenter Contact Information

Name: Eric McSwain  
Date: 4/24/2023 12:00:00 AM  
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#### Proposed Building Standard

Title 24 Part #: Part 2  
Section #: (ET Item 11) 11B-233.3.1.2.1  
Proposing State Agency: DSA-AC  
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):  
Further Study Required

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

11B-233.3.1.2.1 begins by stating:

"11B-233.3.1.2.1 Elevator buildings. A residential building with one or more elevators shall have an elevator serve all floors with a residential dwelling unit entrance and all floors with common use spaces."

This text ("...shall have an elevator serve all floors...") could be read to say that a residential building must provide at least one elevator that serves every floor that provides access to individual dwelling unit entrances and/or common use spaces. I imagine that is not the intent, but it wouldn't surprise me if some folks read it that way. Of course, buildings may be configured in such a way that, in order to access every floor, one must use different elevators. Please consider revising this section to provide clarity and reflect this possibility. Perhaps something along the lines of:

11B-233.3.1.2.1 Elevator buildings. A residential building with one or more elevators shall have provide elevator service to all floors with a residential dwelling unit entrance and all floors with

common use spaces required to be accessible.

I find the language of the proposed exceptions to be clumsy/confusing, but I don't have any suggestions at this time as to how they might be improved.

Thank you.

9 Point Criteria Info:

18930(a) 6